

Before the
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

In the Matter of:

Petition to abandon anti-interference measure)
Of mandatory automatic power reduction) **RM-**
11325
In the use of Spread Spectrum transmissions)
In the Amateur Service)

REPLY COMMENT

Please consider this document timely filed to respond to
Petitioner's counsel in his summary Reply to Comments filed
against his group's Petition.

The attorney hired by the Petitioner has failed to respond to
Comments citing a serious flaw in his group's request of the
Commission, that of not having demonstrated that they have an
active interest in the communications mode for which they wish to
change the Rules.

Counsel has asserted that there is little growth in Spread
Spectrum activity and that the automatic power limitation is not
the cause of this lack of activity. The group did not establish its
standing in this matter by submitting details of any activity by its
own club station at Petitioner's compound, W1AW, nor did it
document activities by outsiders that might have supported the
premise of its request for rule making.

The American Radio Relay League, while it prefers to position
itself as a representative association for the hobby of ham radio, in
reality holds subscriptions from less than a fifth of the licensed
operators in the Amateur Service, according to records it has filed

with the U.S. Postal Service as part of its magazine publishing. Specific to this Petition, the group fails to cite any survey of their own small number of Amateurs to demonstrate operating patterns or levels of interest to warrant its request to discontinue automatic power control of spread spectrum transmissions.

Courson REPLY page 2 of 2

There was no known survey by this group of the greater number of Amateurs who do not participate in their subscription-based membership, suggesting that the effects of this Petition, were it to be enacted, are unknown. The low level of participation in the FCC's Comment system for RM-11325 is more evidence this proposal is not an item requiring action.

Consequently, with no significant support for having this interference-reducing strategy abandoned by the Amateur Service, nor even a situational, pressing need to implement such a change, it would be appropriate for the Commission to simply forego Petitioner's request.

The American Radio Relay League, while it retains only a small number of subscribers among the greater Amateur community, should continue to be allowed to file such Petitions in the future as it sees fit.

However, given at least one recent controversial proposal from this group that has generated a high volume of overwhelming opposition (see Comments in the unresolved petition RM-11306) it would be in the Commission's interest in its Report and Order to ask this group to more fully establish by survey whether it has support for such rule making among its own subscriber base and the broader group of licensees it would affect.

These steps would help preclude the FCC's potential workload and would minimize the prospects of an unsettled response from

licensed, active amateurs who have shown they are increasingly puzzled by regulatory requests spawned by narrow, special interests that appear to be guiding the American Radio Relay League.

Respectfully,

/s/

Paul S. Courson

Amateur WA3VJB

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